

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS

EDWIN P. WILSON,

Plaintiff,

Civil Action No. H-05-3646

v.

LAWRENCE BARCELLA, CHARLES A.  
BRIGGS, THEODORE S. GREENBERG,  
STEPHEN TROTT, DELWEN L. JENSEN,  
MARK M. RICHARD, JAMES L.  
POWERS, DANIEL K. HEDGES, JANE  
and JOHN DOES I-XX,

Defendants.

**DECLARATION OF NICHOLAS STYANT-BROWNE IN SUPPORT OF  
PLAINTIFF'S MOTION TO AMEND COMPLAINT**

I, Nicholas Styant-Browne, declare under penalty of perjury under the laws of the State of Washington that the following is true and correct:

1. I am counsel for the Plaintiff in this above-captioned action, and I am competent to testify to the matters contained herein. I make this declaration in support of Plaintiff's Motion to Amend the Complaint.

2. Attached as Exhibit 1 is a true and correct copy of the First Amended Complaint that Plaintiff requests leave to file.

3. Attached as Exhibit 2 is a true and correct copy of the stipulation between Plaintiff and the U.S. to substitute the U.S. as defendant to the intentional infliction of emotional distress claim and to amend the complaint to remove that claim.

4. Attached as Exhibit 3 is a true and correct copy of Plaintiff's Notice of Voluntary Dismissal Without Prejudice of all claims brought against Stanley Sporkin, filed with the Court on Feb. 16, 2006 (See Docket No. 44).

Executed this 31st day of March, 2006, at Seattle, Washington.

/s/ Nicholas Styant-Browne  
Nicholas Styant-Browne

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Declaration Of Nicholas Styant-Browne In Support Of Plaintiff's Motion to Amend the Complaint was electronically filed with the Court and served on counsel for the parties via electronically and U.S. First Class Mail on this 31 day of March, 2006 to:

<p>Deborah J. Jeffrey Zukerman Spaeder 1800 M. Street, NW Suite 1000 Washington, DC 20036 Tel.: 202-778-1827 Fax: 202-822-8106</p> <p>Melinda M. Sarafa Zuckerman Spaeder LLP 1114 Avenue of the Americas, 41st Fl. New York, NY 10036 Email: <a href="mailto:msarafa@zuckerman.com">msarafa@zuckerman.com</a> Tel.: 212-704-4347 Fax: 212-704-4256</p>	<p>Counsel for Defendant Lawrence Barcella</p>
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s/ Steve W. Berman  
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